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U-210590

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Mr. Jeff Killip
Executive Director and Secretary
Washington Utilities and Transportation Commission
621 Woodland Square Loop SE
Lacey, WA 98503

RE: Docket U-210590 - Avista's Comments on the Commission's Proceeding to Develop a Policy Statement Addressing Alternatives to Traditional Cost of Service Rate Making

Dear Mr. Killip,

On May 28, 2024, the Washington Utilities and Transportation Commission (Commission) held a workshop in the above referenced docket pursuant to the Notice of Workshop and Opportunity to Comments (Notice) issued in Docket U-210590 on April 18, 2024. During the workshop, the Commission requested that any part wishing to submit additional written comments in response to the workshop do so by June 4, 2024. Avista Corporation, dba Avista Utilities (Avista or the Company), submits the following comments in response to the workshop.

Regarding Arrearage Management Plans (AMPs), discussion surrounded the length of time it takes for customers to enroll in an AMP and if that time can be tracked and reported on. Importantly, as soon as a customer contacts Avista to enroll in an AMP, they are immediately enrolled with not delay in timing. The only situation where a customer's AMP may not start immediately is when they have an energy assistance grant on their account. In that situation, the AMP would begin when the grant was fully used towards their arrears or current amounts owing. If a customer enrolls in an AMP through a Community Based Organization (CBO), the AMP begins as soon as the CBO provides the information to Avista, which can happen immediately through Avista's Agency Workbench, which is a software interface Avista provides for agency use. Because of the immediate enrollment in an AMP, it does not make sense to track and report on the length of time it takes to enroll customers in an AMP.

Also, The Company reiterates its previous comments regarding the proposed metric to track revenues that occur through tariff riders or other mechanisms outside of Multi-Year Rate Plans (MYRP). Tariff riders are only in place if they have been approved by the Commission and the Commission was aware of the effects of the tariff riders when they approved them, including that certain tariff riders may have unknown future costs or a significant amount of variability. Tracking this information on a quarterly or annual basis may not provide meaningful insights due to the variability of the tariff riders

and this information is not actionable, thus it is unclear what the Commission may do with the information. Importantly, tariff riders are not a way for utilities to generate additional revenues, rather they are intended to pass thru costs incurred for a specific purpose (i.e., energy efficiency or energy assistance) directly to customers.

If you have any questions regarding this filing, you can contact me at 509-495-2782 or shawn.bonfield@avistacorp.com.

Sincerely,

/s/ Shawn Bonfield

Shawn Bonfield
Sr. Manager of Regulatory Policy & Strategy

